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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GABRIELA BERDUZCO,

Case No. 2:20-cv-01976-MCE-AC

Plaintiff,

vs.

**REQUEST AND STIPULATION TO
EXTEND THE DISCOVERY DEADLINE;
ORDER**

C & C NORTH AMERICA, INC. WHICH
WILL DO BUSINESS IN CALIFORNIA AS
SMDS WEST COAST, (aka COSENTINO, aka,
COSENTINO NORTH AMERICA); JEFF
PRATT; EMITT ISAACKS and DOES 1-50,

**FRCP 16(b)(4)
Local Rule 143, 144**

Defendants.

I. STIPULATION

WHEREAS On October 2, 2020, this Court issued an Order stating that all discovery, with the exception of expert discovery, shall be completed no later than three hundred and sixty-five (365) days from the date of the last answer filed. (DOC 4).

WHEREAS the last answer was filed on May 18, 2021, by Defendant Jeff Pratt. (DOC 10).

WHEREAS the deadline for all discovery, with the exception of expert discovery, is May 17, 2022.

1 WHEREAS on June 30, 2019, Plaintiff served over a hundred Request for Production of
2 Documents on each of the defendants in this matter.

3 WHEREAS subsequent to that date, the parties have been engaged in extensive meeting and
4 conferring regarding the production of those requested documents.

5 WHEREAS the parties are continuing to meet and confer with regard to the production of the
6 requested documents.

7 WHEREAS given the state of discovery, it is apparent that additional discovery needs to be
8 conducted by both parties.

9 WHEREAS the revealed documents have demonstrated the need to depose several individuals
10 who are not parties to this action.

11 WHEREAS the additional discovery is necessary to increase the potential or settlement
12 without the necessity of trial.

13 WHEREAS no requests for extending the time for discovery has been sought or given in this
14 matter.

15 WHEREAS as such, the parties require and additional sixty (60) days to complete the
16 discovery in this matter.

17 Plaintiff Gabriela Berduzco and Defendants C&C North America, Inc., Jeff Pratt, and Emmitt
18 Isaacks, thought their undersigned counsel, hereby stipulate to the extension of discovery sixty (60)
19 days, from May 17, 2022 until July 17, 2022.

20
21 IT IS SO STIPULATED.

22 Dated: April 26, 2022

/s/ Paul Alaga

23 Paul L. Alaga,
24 Attorney for Plaintiff

25 Dated: April 26, 2022

/s/ Chelsea Tirgardoorn


26 Chelsea Tirgardoorn,
27 Attorney for Defendants
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II. ORDER

The Court approves the foregoing stipulation and hereby orders that the deadline for discovery be extended sixty (60) days from May 17, 2022 until July 17, 2022. All other deadlines shall be extended accordingly.

IT IS SO ORDERED.

Dated: May 2, 2022



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE